

SF-83 SUPPORTING STATEMENT  
ENVIRONMENTAL PROTECTION AGENCY  
NESHAP: OIL AND NATURAL GAS PRODUCTION

**1. Identification of the Information Collection**

**1(a) Title of the Information Collection**

ICR for NESHAP: Oil and Natural Gas Production (40 CFR Part 63, Subpart HH)

**1(b) Short Characterization/Abstract**

The National Emission Standards for Hazardous Air Pollutants (NESHAP), for the regulations published at 40 CFR Part 63, Subpart HH, were proposed on February 6, 1998 and promulgated on June 17, 1999. These regulations apply to the following facilities in 40 CFR Part 63, Subpart HH: facilities that are major sources of hazardous air pollutants (HAP) that process, upgrade, or store hydrocarbon liquids prior to the point of custody transfer; or that process, upgrade, or store natural gas prior to the point at which natural gas enters the natural gas transmission and storage source category, or is delivered to a final end user, and that commence construction, modification or reconstruction after the date of proposal. The emissions controlled by this regulation are total organic compounds (TOC) or hazardous air pollutants (HAP). Specifically exempted from this regulation are oil and natural gas production wells. This information is being collected to assure compliance with 40 CFR Part 63, Subpart HH.

In general, all NESHAP standards require initial notifications, performance tests and periodic reports. Owners or operators are also required to maintain records of the occurrence and duration of any start-up, shutdown, or malfunction in the operation of an affected facility, or any period during which the monitoring system is inoperative. These notifications, reports, and records are essential in determining compliance, and are required of all sources subject to NESHAP.

Any owner or operator subject to the provisions of this part shall maintain a file of these measurements, and retain the file for at least 5 years following the date of such measurements, maintenance reports, and records. All reports are sent to the delegated State or Local authority. In the event that there is no such delegated authority, the reports are sent directly to the EPA Regional Office.

Approximately 484 sources are currently subject to the regulation and it is estimated that an additional 14 sources per year will become subject to the regulation in the next three years. The average annual respondent cost for this ICR will be \$1,608,035. This ICR is submitted with no terms of clearance.

## **2. Need for and Use of the Collection**

### **2(a) Need/Authority for the Collection**

The EPA is charged under Section 112 of the Clean Air Act, as amended, to establish standards for each category or subcategory of major sources and area sources of hazardous air pollutants. These standards are applicable to new or existing sources of hazardous air pollutants and shall require the maximum degree of emission reduction. In addition, Section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with Section 114(a)(3); and (G) provide such other information as the Administrator may reasonably require.

In the Administrator's judgment, TOC or HAP emissions from oil and natural gas production cause or contribute to air pollution that may reasonably be anticipated to endanger public health or welfare. Therefore, NESHAP were promulgated for this source category at 40 CFR Part 63, Subpart HH.

### **2(b) Practical Utility/Users of the Data**

The control of emissions of TOC or HAP from oil and natural gas production requires not only the installation of properly designed equipment, but also the operation and maintenance of that equipment. Emissions of TOC or HAP from oil and natural gas production are the result of operation of the affected facilities. The subject standards are achieved by the reduction of TOC or HAP emissions using the following control devices: (1) controlled combustion devices (e.g. thermal vapor incinerators, catalytic vapor incinerators, process heaters); (2) vapor recovery devices (e.g. carbon absorption system or condenser); (3) flares and, (4) leak detection and recovery (LDAR) procedures. The notifications required in the applicable regulations are used to inform the Agency or delegated authority when a source becomes subject to the requirements of the regulations. The reviewing authority may then inspect the source to check if the pollution control devices are properly installed and operated, leaks are being detected and repaired, and the regulations are being met. Performance test reports are needed as these are the Agency's record of a source's initial capability to comply with the emission standards, and serve as a record of the operating conditions under which compliance was achieved.

The operating conditions are as follows: controlled combustion devices must be designed and operated so as to (1) reduce TOC or total HAP by 95% or greater by weight; (2) reduce concentrations of TOC or total HAP by 20 ppm or less (volume, dry basis); or (3) operate at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius. A vapor recovery device or other control device that is designed to operate so as to (1) reduce TOC or total HAP by 95% or greater by weight; (2) reduce concentrations of TOC or total HAP by 20 ppm or less (volume, dry basis); or (3) operate at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius. Flares shall be designed and operated to conform with the requirements of the general provisions at 40 CFR 63.11.

The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations. The information generated by the monitoring, recordkeeping and reporting requirements described in this ICR is used by the Agency to ensure that facilities affected by the NESHAP continue to operate the control equipment and achieve compliance with the regulation. Adequate monitoring, recordkeeping, and reporting is necessary to ensure compliance with the applicable regulations, as required by the Clean Air Act. The information collected from recordkeeping and reporting requirements is also used for targeting inspections, and is of sufficient quality to be used as evidence in court.

### **3. Nonduplication, Consultations, and Other Collection Criteria**

The recordkeeping and reporting requested is required under 40 CFR Part 63, Subpart HH.

#### **3(a) Nonduplication**

If the subject standards have not been delegated, the information is sent directly to the appropriate EPA Regional Office. Otherwise, the information is sent directly to the delegated State or local agency. If a State or local agency has adopted their own similar standards to implement the federal standards, a copy of the report submitted to the State or local agency can be sent to the Administrator in lieu of the report required by the federal standards. Therefore, no duplication exists.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

An announcement of a public comment period for the renewal of this ICR was published in the Federal Register on January 30, 2002, (67FR4421). No comments were received on the burden published in the Federal Register.

### **3(c) Consultations**

Industry trade associations and EPA personnel were consulted for this ICR. No comments were received on the burden published in the Federal Register.

### **3(d) Effects of Less Frequent Collection**

Less frequent information collection would decrease the margin of assurance that facilities are continuing to meet the standards. Requirements for information gathering and recordkeeping are useful techniques to ensure that good operation and maintenance practices are applied and emission limitations are met. If the information required by these standards was collected less frequently, the likelihood of detecting poor operation and maintenance of control equipment and noncompliance would decrease.

### **3(e) General Guidelines**

None of these reporting or recordkeeping requirements violate any of the regulations established by OMB at 5 CFR 1320.5.

### **3(f) Confidentiality**

The required information consists of emissions data and other information that have been determined not to be private. However, any information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, Part 2, Subpart B - Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

### **3(g) Sensitive Questions**

None of the reporting or recordkeeping requirements contain sensitive questions.

## **4. The Respondents and the Information Requested**

### **4(a) Respondents/SIC Codes**

The respondents to the recordkeeping and reporting requirements are owners or operators of TOC or HAP-emitting processes and operations that are used in the various segments of the oil and natural gas production source category.

Regulation	SIC Codes	NAICS Codes
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40 CFR Part 63, Subpart HH	1311	211111
40 CFR Part 63, Subpart HH	1321	211112

#### **4(b) Information Requested**

These standards require affected facilities to maintain all records, including reports and notifications for at least five years. This is consistent with the General Provisions of 40 CFR Part 63 as applied to the standards, and with the five year records retention requirement in the operating permit program under Title V of the CAA. EPA believes that the five year records retention requirement is consistent with the five year statute of limitations on which the permit program is based. Also, the retention of records for five years would allow EPA to establish the compliance history of a source and any pattern of compliance for purposes of determining the appropriate level of enforcement action. Historically, EPA has found that the most flagrant violators frequently have violations extending beyond the five years. EPA would be prevented from pursuing the worst violators due to the destruction or nonexistence of records if records were retained for less than five years.

#### **(i) Data Items**

All data in this ICR that is recorded and/or reported is required by the NESHAP From Oil and Natural Gas Production Facilities (40 CFR Part 63, Subpart HH). A source must make the following reports:

<b>Reports for 40 CFR Part 63, Subpart HH</b>	
Construction/reconstruction	63.5
Initial notifications	63.9(b), 63.775(b)
Performance test reports	63.10(d)
Performance evaluation reports for CMS	63.10(e)
Initial performance test results	63.10(d)(2)
Initial performance test	63.7(b), 63.9(e) and (g), 63.775(d)
Rescheduled initial performance test	63.7(b)(2)
Demonstration of continuous monitoring system	63.9(g)
Compliance status	63.9(h), 63.775(b) and (d)

<b>Reports for 40 CFR Part 63, Subpart HH</b>	
Periodic start-up, shutdown, malfunction reports	63.10(d)(5), 63.775(b)
Summary report	63.10(e)(3)
Periodic report	63.10(e), 63.775(e)
Notification of process change	63.775(f)

A source must maintain the following records:

<b>Recordkeeping for 40 CFR Part 63, Subpart HH</b>	
Start-ups, shutdowns, malfunctions, periods where the continuous monitoring system is inoperative	63.10(b)(2), 63.774(b)(3)(ii)
All reports and notifications	63.10, 63.774
Records of all maintenance performed on air pollution control equipment	63.10(b)(2)
Record of applicability	63.10(b)(3)
Records for sources with continuous monitoring systems	63.10(b)(3), 63.774(b)(4)
Records are required to be retained for 5 years. The most recent 12 months of records must be retained at the facility.	63.10(b)(1), 63.774
Benzene emissions records	63.774(c)

**(ii) Respondent Activities**

<b>Respondent Activities</b>
Read instructions.
Gather relevant information.
Install, calibrate, maintain, and operate closed vent systems and CMS to: 1) achieve a 95% reduction in HAP, TOC, or total HAP, for control devices and vapor recovery devices; 2) achieve a reduction to 20 ppm of TOC or total HAP, and operates at a minimum residence time of 0.5 seconds at a minimum temperature of 760 degrees Celsius for combustion devices.

<b>Respondent Activities</b>
Perform initial performance tests, and repeat performance tests if necessary (using Method(s) 1, 1A; 2, 2A, 2C or 2D; or either Method 18 or 25A: located at 40 CFR part 60, appendix A).
Write the notifications and reports listed above.
Enter information required to be recorded above.
Submit the required reports developing, acquiring, installing, and utilizing technology and systems for the purpose of collecting, validating, and verifying information.
Develop, acquire, install, and utilize technology and systems for the purpose of processing and maintaining information.
Develop, acquire, install, and utilize technology and systems for the purpose of disclosing and providing information.
Adjust the existing ways to comply with any previously applicable instructions and requirements.
Train personnel to be able to respond to a collection of information.
Transmit, or otherwise disclose the information.

It is estimated that 10% of the responses to this ICR can be collected electronically.

## **5. The Information Collected -- Agency Activities, Collection Methodology, and Information Management**

### **5(a) Agency Activities**

EPA conducts the following activities in connection with the acquisition, analysis, storage, and distribution of the required information.

<b>Agency Activities</b>
Observe initial performance tests and repeat performance tests if necessary.
Conduct on-site inspections as necessary.
Review notifications and reports, including performance test reports, and excess emissions reports, required to be submitted by industry.
Audit facility records.

Agency Activities
Input, analyze, and maintain data in the AIRS (Aerometric Information Retrieval System) Facility Subsystem (AFS) database.

### **5(b) Collection Methodology and Management**

Following notification of start-up, the reviewing authority might inspect the source to determine whether the pollution control devices are properly installed and operated. Performance test reports are used by the Agency to discern a source's initial capability to comply with the emission standard. Data and records maintained by the respondents are tabulated and published for use in compliance and enforcement programs. The semiannual reports are used for problem identification, as a check on source operation and maintenance, and for compliance determinations.

Information contained in the reports is entered into AFS which is operated and maintained by EPA's Office of Air Quality Planning and Standards. AFS is EPA's database for the collection, maintenance, and retrieval of compliance and annual emission inventory data for over 100,000 industrial and government-owned facilities. EPA uses AFS for tracking air pollution compliance and enforcement by State and local regulatory agencies, EPA Regional Offices and EPA Headquarters. EPA and its delegated authorities can edit, store, retrieve and analyze the data. The records required by this regulation must be retained by the owner or operator for five years.

### **5(c) Small Entity Flexibility**

There are no small businesses affected by this regulation.

### **5(d) Collection Schedule**

The specific frequency for each information collection activity within this request is shown in Table 2: Annual Industry Reporting and Recordkeeping Requirements, Existing and New Sources.

## **6. Estimating the Burden and Cost of the Collection**

Table 2 documents the computation of individual burdens for the recordkeeping and reporting requirements applicable to the industry for the subpart included in this ICR. The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified. Responses to this information collection are mandatory.



The Agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

### **6(a) Estimating Respondent Burden**

The average annual burden to industry over the next three years from these recordkeeping and reporting requirements is estimated to be 29,489 hours (total annual labor hours from Table 2). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with the NESHAP program, the previously approved ICR, and any comments received.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

This ICR uses the following labor rates: \$78.54 (\$37.40 + 110% overhead) per hour for Executive, Administrative, and Managerial labor; \$55.34 (\$26.35 + 110% overhead) per hour for Technical labor, and \$35.64 (\$16.97 + 110% overhead) per hour for Clerical labor. This rate is from the United States Department of Commerce Bureau of Labor Statistics, March 2000, "Table 10. Private industry, by occupational and industry group." The rates are from column 1, "Total compensation." The hourly wage rates have been increased by 110% to account for the benefit packages available to those employed by private industry. For the purposes of this analysis, it is assumed that each labor hour is composed of 5 percent management, 85 percent technical, and 10 percent clerical, resulting in an average hourly rate of \$54.53 per hour.

#### **(ii) Estimating Capital/Startup and Operation and Maintenance Costs**

The type of industry costs associated with the information collection activity in the regulations are labor and CEMs. The capital/startup costs are one time costs when a facility becomes subject to the regulation. The annual operation and maintenance costs are the ongoing costs to maintain the monitor and other costs such as photocopying and postage.

#### **(iii) Capital/Startup vs. Operation and Maintenance (O&M) Costs**

<b>Capital/Startup vs. Operation and Maintenance (O&amp;M) Costs</b>						
(A) Continuous Monitoring Device	(B) Startup Cost (\$) for One Affected Facility	(C) No. of New Affected Facilities to Startup	(D) Total Startup (B x C)	(E) Annual O&M Costs (\$) for One Affected Facility	(F) No. of Affected Facilities with O&M	(G) Total O&M (E x F)
Combustion Device	991	11	10,901	1,090	453	493,770
Flares	1,423	3	4,269	427	102	43,554
Vapor Recovery	232	4	928	93	147	13,671
Total of all Continuous Monitoring Devices			\$16,098			\$550,995

The total capital/startup costs for this ICR are \$16,098. This is the total of column D. This cost is shown on the OMB 83-I form in block 14 letter a (Total annualized capital/startup costs (O&M)). It should be noted that the numbers in block 14 of the OMB 83-I form are rounded to show the cost in thousands of dollars.

The total operation and maintenance (O&M) costs for this ICR are \$550,995. This is the total of column G. This cost is shown on the OMB 83-I form in block 14 letter b (Total annual costs (O&M)).

The total respondent non-labor costs in block 14 have been calculated as the addition of the capital/startup costs, and the annual operation and maintenance costs. The average annual cost for capital/startup, and operation and maintenance costs to industry over the next three years of the ICR is estimated to be \$567,093. This cost is shown on the OMB 83-I form in block 14 letter c (Total annualized cost requested).

### **6(c) Estimating Agency Burden and Cost**

The only costs to the Agency are those costs associated with analysis of the reported information. Publication and distribution of the information are part of the AFS program.

Examination of records to be maintained by the respondents will occur as part of the periodic inspection of sources, which is part of EPA's overall compliance and enforcement program.

The average annual Agency cost during the 3 years of the ICR is estimated to be \$180,243 (see Table 1). The Agency labor rate is calculated using \$49.82 (GS-13, Step 5, \$31.14 x 1.6) per hour for Managerial labor, \$36.98 (GS-12, Step 1, \$23.11 x 1.6) per hour for Technical labor, and \$20.00 (GS-6, Step 3, \$12.50 x 1.6) per hour for Clerical labor. These rates are from OPM's "2001 General Schedule" which excludes locality rates of pay. For this analysis, it is assumed that each labor hour is composed of 5 percent management, 85 percent technical, and 10 percent clerical, including 60 percent to account for government overhead expenses, resulting in an average hourly rate of \$35.92. Details upon which this estimate is based appear in Table 1, attached below.

#### **6(d) Estimating the Respondent Universe and Total Burden and Costs**

<b>Respondent Universe</b>					
Regulation Citation	(A) No. of New Sources/Year	(B) No. of Initial Reports for New Sources	(C) No. of Existing Sources	(D) No. of Reports for Existing Sources	(E) Total Annual Responses (AxB)+(CxD)
40 CFR Part 63, Subpart HH	14	2	484	2	996

The number of total respondents is 498. This number is the sum of Column A and Column C of the Respondent Universe table above. This represents the number of existing sources plus the number of anticipated new sources averaged over the three-year period of this ICR. It is shown in block 13 (a), Number of respondents, on the OMB 83-I form.

The number of Total Annual Responses is 996. This is the number in column E of the Respondent Universe table above. It is shown in block 13 (b), Total annual responses, on the OMB 83-I form. The total annual labor costs (including training labor and costs for new sources) are \$1,994,961. This number is not shown on the OMB 83-I form in block 13(c), Total hours requested. Only the burden hours are reflected in block 13(c). Details upon which this estimate is based appear in Table 2. Annual Industry Reporting and Recordkeeping Requirements; Existing and New Sources.

The total annual capital and O&M costs to the regulated entity are \$567,093. This number is shown on the OMB 83-I form in block 14 (c), Total annualized cost requested. These costs are detailed in section 6(b)(iii), Capital/Start-up vs. Operating and Maintenance (O&M) Costs.

#### **6(e) Bottom Line Burden Hours Burden Hours And Cost Tables**

The bottom line burden hours and cost tables for both the Agency and the respondents are attached.

#### **6(f) Reasons for Change in Burden**

The increase in burden hours from the most recently approved ICR is due an increase in the burden hours placed upon the affected industry since the last approved ICR. This is attributed to full affected industry compliance with the regulations, rather than the prior ICRs accounting for gradual compliance over the allowed three year period.

#### **6(g) Burden Statement**

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's standards are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to Susan Auby, Collection Strategies Division ( Mail Code 2822), Office of Environmental Information, United States Environmental Protection Agency, 1200 Pennsylvania Avenue, NW, Washington, D.C. 20460-0001; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Include the EPA ICR number 1788.03 and 2060-0417 OMB Control Number in any correspondence.

#### **Part B of the Supporting Statement**

This part is not applicable because no statistical methods were used in collecting this information.

Table 1. Estimated Federal Burden.						
Activity	A. Person hours per response or task	B. Annual # of responses or tasks	C. Total annual person hours (A x B)	D. Annual labor cost (C x \$35.92)	E. Annual direct costs	F. Total annual cost (D + E)
1. Review reports						
a. Initial notification	2	14	28	1,006	0	1,006
b. Preconstruction review application	4	14	56	2,012	0	2,012
c. Performance test notification	2	17	34	1,221	0	1,221
d. Compliance status notification	4	501	2,004	71,984	0	71,984
e. Performance test reports	4	17	68	2,443	0	2,443
d. Startup / shutdown / malfunction reports	2	501	1,002	35,992	0	35,992
g. Semi-annual summary reports	2	515	1,030	36,998	0	36,998
2. Compliance inspections						
a. Select site and review permit file	4	17	68	2,443	0	2,443
b. Travel to/from site	8	17	136	4,885	1,000	5,885
c. On-site inspection	4	17	68	2,443	0	2,443
d. Prepare inspection report	16	17	112	4,023	0	4,023
3. Enforcement action						
a. Notice of noncompliance	160	2	320	11,494	0	11,494
b. Followup compliance inspection	32	2	64	2,299	0	2,299
c. Litigation	N.A.					
Total						180,243



<b>Table 2. Annual Industry Reporting and Recordkeeping Requirements; Existing and New Sources.</b>						
Reporting and Recordkeeping Requirements	A. Person hours per occurrence	B. Annual occurrences per respondent	C. Annual person hours per respondent (A x B)	D. Total number of respondents	E. Total annual person hours ( C x D )	F. Total annual cost (E x \$54.53)
1. Reporting requirements						
a. Read instructions	4	1	4	14	56	3,054
b. Gather existing information	8	1	8	14	112	6,107
c. Write reports						
i. Initial notification	2	1	2	14	28	1,527
ii. Performance review application	2	1	2	14	28	1,527
iii. Performance test notification	2	1	2	5	10	545
iv. Compliance status notification	4	1	4	484	1,936	105,570
v. Performance test reports	4	1	4	5	20	1,091
vi. Startup /shutdown /malfunction reports	2	2	4	484	1,936	105,570
vii. Semi-annual summary report	2	2	4	484	1,936	105,570
2. Recordkeeping requirements						
a. Read instructions	4	1	4	484	1,936	105,570
b. Plan activities	16	1	16	484	7,744	422,280
c. Implement activities						
i. Material determinations	4	1	4	13	52	2,836

**Table 2. Annual Industry Reporting and Recordkeeping Requirements; Existing and New Sources.**

<b>Reporting and Recordkeeping Requirements</b>	<b>A. Person hours per occurrence</b>	<b>B. Annual occurrences per respondent</b>	<b>C. Annual person hours per respondent (A x B)</b>	<b>D. Total number of respondents</b>	<b>E. Total annual person hours ( C x D )</b>	<b>F. Total annual cost (E x \$54.53)</b>
ii. Control equipment inspections	N.A.					
iii. Control equipment leak monitoring	4	2	8	13	104	5,671
iv. Control devices						
Design analysis	16	1	16	39	624	34,027
Performance test	40	1	40	5	200	10,906
Operate and maintain CMS	2	12	24	14	336	18,322
v. LDAR program						
Identify all affected streams	7	1	7	2	14	763
Perform monitoring /repair	5	12	60	2	120	6,544
d. Develop record system						
i. Develop startup/shutdown/malfunction plan	20	1	20	14	280	15,268
ii. Control equipment	8	1	8	14	112	6,107
iii. LDAR program	13	1	13	2	26	1,418
e. Time to enter information						
i. Cover designs	8	1	8	5	40	2,181
ii. Control device design	8	1	8	14	112	6,107
iii. Control equipment testing	1	1	1	5	5	273



**Table 2. Annual Industry Reporting and Recordkeeping Requirements; Existing and New Sources.**

<b>Reporting and Recordkeeping Requirements</b>	<b>A. Person hours per occurrence</b>	<b>B. Annual occurrences per respondent</b>	<b>C. Annual person hours per respondent (A x B)</b>	<b>D. Total number of respondents</b>	<b>E. Total annual person hours ( C x D )</b>	<b>F. Total annual cost (E x \$54.53)</b>
iv. Control equipment inspection	1	2	2	484	968	52,785
v. Control equipment monitoring	1	2	2	484	968	52,785
vi. Control device CMS	1	12	12	484	5,808	316,710
vii. LDAR program	1	12	12	2	24	1,309
viii. Material determination	1	1	1	7	7	382
f. Time to train personnel						
i. Material determination methods	8	1	8	5	40	2,181
ii. Control equipment inspection & monitoring	8	1	8	484	3,872	211,140
iii. LDAR program	5	1	5	7	35	1,909
Total					29,489	1,608,035